
EXHIBIT A

Sam Joyner

From: Cohen, Justin S (DAL - X61211) <Justin.Cohen@hklaw.com>
Sent: Thursday, October 28, 2021 1:01 PM
To: Sam Joyner
Cc: Wynne, Richard L (DAL - X61386); Haghighatian, Nadia E (DAL - X61261); Alfonso Chan; Mark Siegmund; Sostek, Bruce S (DAL - X61234); Bustamante, Bryan J (DAL - X61364)
Subject: RE: Purdue v. STMicroelectronics N.V. et al., No. 6:21-cv-00727-ADA (W.D. Tex.)

CAUTION: External Email!

Sam - thank you for the response. ST complied with the Court's requirements on preparing the CRSR. Unfortunately, while it's clear that Purdue was in the process of preparing the amended complaint and expanded infringement contentions, Purdue chose not to disclose any of that information with ST during the meet-and-confer process or while preparing the joint CRSR. Given Monday's deadline, we feel compelled to file our version today. If Purdue feels the need to respond, Purdue has that option.

We would like to meet-and-confer tomorrow on the issues raised by Purdue's FAC and expanded infringement contentions. Can we have the call at 1 or 2pm Central tomorrow? If not, we can find some other availability tomorrow.

Thank you,

~Justin

Justin S. Cohen | Holland & Knight

Direct 214.969.1211 | Cell 214.605.1993

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From: Sam Joyner <sjoyner@shorechan.com>
Sent: Thursday, October 28, 2021 8:45 AM
To: Cohen, Justin S (DAL - X61211) <Justin.Cohen@hklaw.com>
Cc: Wynne, Richard L (DAL - X61386) <Richard.Wynne@hklaw.com>; Haghighatian, Nadia E (DAL - X61261) <Nadia.Haghighatian@hklaw.com>; Alfonso Chan <achan@shorechan.com>; Mark Siegmund <mark@swclaw.com>; Sostek, Bruce S (DAL - X61234) <Bruce.Sostek@hklaw.com>
Subject: RE: Purdue v. STMicroelectronics N.V. et al., No. 6:21-cv-00727-ADA (W.D. Tex.)

[External email]

Hi Justin,

By the Court's design, the parties are required to file a joint CRSR. Here, if STNV and ST. Inc. desire to supplement the CRSR (ECF No. 25) filed on October 18, Purdue should be provided an opportunity to include its positions in the same document. Otherwise, Defendants will force Judge Albright to traverse between two documents because Purdue will have no other choice but to file a supplement that responds to Defendants' positions. Let's avoid that by filing a joint supplemental CRSR. If you send me a Word version of the document attached to your email below, I'll add Purdue's positions.

Also, we should meet-and-confer before filing a supplemental CRSR. We're generally available all day today and tomorrow. Please let me know what time works best for your team.

Thanks,
Sam

Samuel E. Joyner
Partner



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From: Cohen, Justin S (DAL - X61211) <Justin.Cohen@hklaw.com>
Sent: Wednesday, October 27, 2021 11:12 PM
To: Sam Joyner <sjoyner@shorechan.com>
Cc: Wynne, Richard L (DAL - X61386) <Richard.Wynne@hklaw.com>; Haghghatian, Nadia E (DAL - X61261) <Nadia.Haghghatian@hklaw.com>; Alfonso Chan <achan@shorechan.com>; Mark Siegmund <mark@swclaw.com>; Sostek, Bruce S (DAL - X61234) <Bruce.Sostek@hklaw.com>
Subject: Purdue v. STMicroelectronics N.V. et al., No. 6:21-cv-00727-ADA (W.D. Tex.)

CAUTION: External Email!

Sam - in light of Purdue's amended complaint and infringement contentions, STNV and ST. Inc. will be filing the attached supplemental CRSR tomorrow. As you'll see, we are requesting a live CMC in order to discuss the various pre-Markman issues.

Regards,

~Justin

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